

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	:	
	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 12-4057
	:	
	:	
MICHAEL DENNENY	:	
4900 horseshoe pike	:	
Downingtown, PA 19335	:	
	:	
And	:	
	:	
ROBERT THOMAS	:	
6828 Torresdale Ave	:	
Philadelphia, PA 19135	:	
	:	
Defendants.	:	

ORDER

TO THE HONORABLE JUDGES OF THE SAID COURT:

Defendant, Robert N. Thomas, files the following answer to the Court of the tax sale of property held on September 13, 2010 as follows:

BY THE COURT:

J.

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 12-4057

MICHAEL DENNENY
4900 horseshoe pike
Downingtown, PA 19335

And

ROBERT THOMAS
6828 Torresdale Ave
Philadelphia, PA 19135

Defendants.

**DEFENDANT, ROBERT N. THOMAS'S ANSWERS TO COMPLAINT TO
FORECLOSE FEDERAL TAX LIENS
AND NEW MATTER**

AND NOW, comes the Defendant/Respondent, Robert Thomas, files the within answers along with new matter to Plaintiff/Petitioner's Complaint to Foreclose Federal Tax Liens.

NATURE OF THE ACTION

1. Admitted

JURISDICTION AND VENUE

2. Denied. Proof to be demanded at trial.
3. Denied. Proof to be demanded at trial.
4. Denied. Proof to be demanded at trial.

PARTIES

- 5. Admitted
- 6. Admitted
- 7. Admitted

COUNT I

FORECLOSE THE FEDERAL TAX LIEN

- 8. Denied. Proof to be demanded at trial.
- 9. Denied. Proof to be demanded at trial.
- 10. Denied. Proof to be demanded at trial.
- 11. Denied. Proof to be demanded at trial.
- 12. Denied. Proof to be demanded at trial.
- 13. Denied. Proof to be demanded at trial.
- 14. Denied. Proof to be demanded at trial.
- 15. Denied. Proof of amount to be demanded at trial.
- 16. Admitted.
- 17. Admitted.
- 18. Denied. Proof to be demanded at trial.
- 19. Denied. Proof to be demanded at trial.
- 20. Denied. Proof to be demanded at trial.
- 21. Admitted.
- 22. Denied. Proof to be demanded at trial.
- 23. Denied. Proof to be demanded at trial.
- 24. Denied. Proof to be demanded at trial.

25. Admitted.

NEW MATTER

1. It is believed Petitioners have no standing.
2. It is believed Petitioners had actual and implied knowledge of the Chester County Upset Sale dated September 13, 2010.
3. It is believed Petitioners had expressed knowledge of the sale.
4. It is believed Petitioners had constructive knowledge of the sale.
5. This is a non-owner occupied property.
6. Petitioner is aware, each year, that County, City and School taxes are due.

WHEREFORE, Respondent respectfully requests this honorable court find in favor of Respondant.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert Thomas', with a long horizontal line extending to the right.

Robert Thomas, Pro Se
6828 Torresdale Avenue, 1st Floor
Philadelphia, PA 19135
(215) 333-2233

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 12-4057

MICHAEL DENNENY
4900 horseshoe pike
Downingtown, PA 19335

And

ROBERT THOMAS
6828 Torresdale Ave
Philadelphia, PA 19135

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the foregoing pleading was served upon counsel of record in this action. Service by registered mail, postage, prepaid was sent to:

U.S. DEPARTMENT OF JUSTICE
TAX DIVISION, RM:6609
Claire H. Taylor
950 Pennsylvania ave, NW
Washington, DC 20277-1806

MICHAEL DENNENY
4900 horseshoe pike
Downingtown, PA 19335

BY: 

Robert Thomas, Pro-Se
6828 Torresdale Ave
Philadelphia, PA 19135

AFFIDAVIT

I Robert Thomas, hereby verifies that the facts set forth in the attached Complaint are true and correct to the best of my knowledge, information and belief. This verification is made pursuant to the penalties of the laws of perjury of the United States.

DATED: 10-12-2012

A handwritten signature in black ink, appearing to read 'Robert N. Thomas', is written over a horizontal line.

Robert N. Thomas

